

1 **THE EMPLOYMENT LAW GROUP, P.C.**

2 R. SCOTT OSWALD (admitted *pro hac vice*)

3 888 17th Street, NW, Suite 900

4 Washington, DC 20006

5 Telephone: (202) 331-2883

6 Facsimile: (202) 261-2835

7 Email: soswald@employmentlawgroup.com

8 Attorneys for Plaintiff/Relator Mary Kaye Welch

9 UNITED STATES DISTRICT COURT  
10 FOR THE DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA AND THE  
12 STATE OF NEVADA *ex rel.* MARY KAYE  
13 WELCH,

14 Plaintiffs,

15 v.

16 My Left Foot Children's therapy, LLC, et al.,

17 Defendants.

Case No. 2:14-cv-01786-MMD-GWF

**STIPULATION AND ~~PROPOSED~~ ORDER OF  
DISMISSAL**

18 Relator Mary Kaye Welch ( "Relator") filed this action under the *qui tam* provision of the False  
19 Claims Act, 31 U.S.C. § 3729, *et seq.*, against Defendants My Left Foot Children's Therapy, LLC  
20 ("My Left Foot"), Ann Marie Gottlieb, and Jon Gottlieb (collectively, "Defendants," and together with  
21 Relator, the United States, and the State of Nevada, the "Parties"). The Parties by and through their  
22 respective counsel, have reached a settlement in this case. Accordingly, there being no objection to the  
23 relief sought, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the parties respectfully

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request that the Court enter the below [Proposed] Order.

IT IS SO STIPULATED.

DATED: \_\_\_\_\_ BY: /s/ R. Scott Oswald  
R. Scott Oswald  
The Employment Law Group, P.C.  
*Attorneys for Relator*

DATED: \_\_\_\_\_ BY: /s/ Troy Flake  
Troy Flake  
Office of the United States Attorney, District of Nevada  
Assistant United States Attorney

DATED: \_\_\_\_\_ BY: /s/ Mark Kemberling  
Mark Kemberling  
State of Nevada, Office of the Attorney General,  
Chief Deputy Attorney General

DATED: Nov. 15, 2018 BY: /s/ Shawn Hanson  
Shawn Hanson  
Akin Gump Strauss Hauer & Feld LLP  
*Attorneys for Defendants*

**ORDER**

IT IS THEREFORE ORDERED that:

1. The allegations in the operative complaint against Defendants are dismissed with prejudice as to the Relator, and are dismissed as to the United States and the State of Nevada consistent with the Settlement Agreement, with prejudice as to the “Covered Conduct” as defined in the Settlement Agreement and otherwise without prejudice;
2. The Court shall retain jurisdiction over any disputes that may arise regarding compliance with the Settlement Agreement; and
3. Having determined there is no just reason for delay, this Order shall be entered accordingly.

IT IS SO ORDERED.

Dated this 19<sup>th</sup> day of November 2018.



United States District Judge